Case 1:18-cv-03450 OTW Document 58 Filed 03/28/19 Page 1 of 2

MEMO ENDORSED

Joint Submission

March 28, 2019

Application Granted. All discovery shall be completed by May 31, 2019.

SO ORDERED.

Ona T. Wang 3/28/2019 United States Magistrate Judge

Honorable Ona T. Wang United States Magistrate Judge Southern District of New York United States Courthouse 500 Pearl Street, Courthouse 20D New York, New York 10007-1312

Re:

King Range, Jr. v. 217 East 26th Street, LLC, et al.

Case No: 1:18-CV-03450-OTW

Dear Judge Wang:

The parties submit this joint letter to report their ongoing, productive discussions to potentially resolve this matter. The Landlord's architect has presented a proposed permanent ramp that would be architecturally and economically feasible. The Plaintiff and his expert are reviewing the drawings of the ramp.

In light of the parties' progress, the parties respectfully request that the discovery deadline be moved from April 22 to May 31. (See ECF No. 47 noting the current April 22 discovery date deadline). The parties had served each other with deposition notices and other discovery as placeholders. That discovery is scheduled for the end of this week and the following week. The parties want to pursue settlement dialogue and not discovery with its attendant litigation expense that may not be necessary.

The parties would appreciate the extension so their full efforts can be devoted to trying to resolve this matter. The parties will keep the Court informed of their ongoing efforts and status. Thank you for your consideration of this request.

Respectfully Submitted,

Robert G. Hanski, Esq.

Robert G. Hanski, Esq.
Parker Hanski LLC
40 Worth Street, 10th Floor
New York, New York 10013
Attorneys for Plaintiff
King Range, Jr.

Benjamin D. Bianco, Esq.

Meister Seelig & Fein LLP 125 Park Avenue, 7th Floor

New York, New York 10017

Attorneys for Landlord Defendants

217 East 26th Street LLC 217 East 26th Street

Newco LLC

M. William Munno

Seward & Kissel LLP

One Battery Park Plaza

New York, New York 10004

Attorneys for Tenant Defendant

Tipsy Scoop LLC